

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,  
Plaintiff,

v.

CRIMINAL NO. 22-342  
(SCC)

[1] WANDA VAZQUEZ GARCED,  
[2] JULIO M. HERRERA VELUTINI,  
[3] MARK T. ROSSINI,  
Defendants.

MOTION TO RESTRICT

TO THE HONORABLE COURT:

COMES NOW, the United States to set forth and request:

In compliance with the Court's Standing Order No. 9 (Amendment to the Restricted Filing and Viewing Levels Module), the United States submits that ECF No. 863 includes details of a sensitive nature. Restricting access to that information circumvents ensuing issues that disclosure would likely entail, including pretrial publicity and subsequent questions regarding the presumption of prejudice. In this instance the right to a fair trial outweighs the right of public access to the matters described at ECF No. 863.

INTENTIONALLY BLANK

WHEREFORE, the United States requests that the Court allow ECF No. 863 to remain restricted to Selected Parties.

**Certificate of Service**

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will notify all counsel of record.

**RESPECTFULLY SUBMITTED**, this 23rd day of May, 2025.

W. STEPHEN MULDROW  
United States Attorney

*s/Myriam Y. Fernandez-Gonzalez*

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